

A motion of Conditional acceptance & a FOIA Request

Good morning commissioners, it's a great day in South Carolina.

I have asked before and ask again to be called Alex, this is my name. I have been on many vessels where I generously tipped two different types of Mr.'s. I am not a Mr. but Alex and out of respect would appreciate being called by my name Alex (all rights reserved).

Second I have a few questions that are required to be answered for me to accept your offer/motion to compel.

Question #1: Duke Energy has sent in the below:

"Enclosed for filing in the above-referenced docket, please find Duke Energy Carolinas, LLC's ("DEC" or the "Company") Motion to Compel. The Company requests the Commission compel Complainant to respond to its discovery requests by a date certain and dismiss the Complaint should Complainant fail to provide complete responses to the Company's discovery requests by the date established by the Commission. As the Company has shown in its Motion, Mr. Kasoshnikov's responses to the Company's discovery requests are necessary for it to prepare and file direct testimony and to meaningfully participate in the hearing. DEC also requests that the Commission hold its testimony deadline and the hearing in abeyance pending resolution of this motion."

Question #1 follows: Who is Mr. Kasoshnikov's? I want to send a motion of discovery to this person? If this party is not Duke Energy and it is not Alex then your ruling of a motion to compel is null and void as I have yet to even address an email or receive correspondence from this individual.

Question #2 The Public Service Commission has written:

"I move that the Commission grant the Motion to Compel with regard to Duke Energy Carolinas' first discovery requests, and hold in abeyance a ruling on whether to compel answers to the second discovery requests at this time. With regard to the first discovery requests, the response by the Complainant related to invoking the Fifth Amendment to the United States Constitution is not valid, since the information requested by Duke cannot lead to criminal liability on the part of the Complainant. The Complainant will have fifteen (15) days from the date of the Order in this matter to respond to the First Duke Discovery Requests under my Motion. I further move that if the Complainant does not furnish the information requested in the first discovery requests, that the Commission consider dismissal of the Complaint and/or additional relief. It is duly noted that the Company has stated that the Complainant has until April 26 to respond to the Company's second set of discovery requests. Therefore I believe that it is premature for the Commission to rule on any Motion to Compel related to these requests.

I also move that the Commission stay any further pre-filing dates for testimony and exhibits, and the hearing date, until further notice of the Commission."

Question #2 follows: what is the definition of “invoking”

#2 b: definition of “Fifth Amendment”

#2 b part 2: Which Constitution are you referring too? There are two different constitutions.

#2 c: definition of “United States”

#2 d: definition of “not valid”

#2 e: definition of “information”

#2 f: definition of “requested”

#2 g: definition of “cannot”

#2 h: definition of “criminal liability”

#2 i: definition of “part of complainant”

#2 j: definition of “the Complainant”

#2 k: definition of “15 in italics”

#2 l: definition of “date of the order”

#2m: definition of “does not furnish”

#2 n: definition of “the information requested”

#2 o: definition of “consider dismissal”

#2 p: definition of “the complaint”

#2 q: definition of “and/or additional relief”

#2 r: definition of “duly noted”

#2 s: definition of “premature”

#2 t: definition of “to rule on”

#2 u: definition of “move the commission”

#2 v: definition of “stay any further”

#2 w: definition of “pre-filing dates for testimony”

#2 x: definition of “further notice of the commission”

There are many definitions to words, their definitions change with a few letters in the beginning of those words, definitions change with the word “the” before a word. For me to understand your agreement and/or contract, I need to know all the possible definitions of the above words, to know what I am agreeing to #1. I need to know the exact meaning that you are using for that word with the words around it #2. I also need to know which law dictionary those words came out of #3. I need to know the definition of those words as outlined in the specific law dictionary listed in #3, #4.

I am requesting the records under the South Carolina Freedom of Information Act S.C. Code 30-4-10 et. seq.

Request #1: The employment history of all seven commissioners including The hearing commissioner Mr. Butler for the last 25 years.

Request #2: The employment history of the seven spouses of the public service commissioners for the last 25 years.

Request #3: The investment history for the last 25 years of each commissioner and their spouses and Mr. Butler and his spouse. Examples would be stocks in the stock market, or with utilities like Duke energy and others. I need all investments.

Request #4: I request the commission's bond/ commissioners personal bonds if they have them. I request Mr. Butler's bond.

I, Alex will accept your offer if all of the above is answered, and I am provided with contact details for the person/individual named in question one. I am giving the Public Service Commission till May 3rd at noon to reply to this offer, if you fail, your motion will be considered null and void.

With deep respect for all that you do for every man and woman in South Carolina,

Alex
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